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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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6 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,

) CRIMINAL INDICTMENT

10 Plaintiff,

)
)

) 2:14-cr-~~54~~

11 vs.

) VIOLATIONS:

12 JEFFREY CHRISTOPHER GRANADOS,

) 18 U.S.C. § 1030(a)(2)(C) and (c)(2)(B)(ii),
) Unauthorized Access to a Protected
 Computer;
) 18 U.S.C. § 2701(a)(1) and (2) and (b)(1)(A),
) Unlawful Access to Stored Communications;
) and
) 47 U.S.C. § 223(a)(1)(C), Use of a
 Telecommunication Device to Annoy, Abuse,
 Threaten or Harass.

13 Defendant.

14

15 THE GRAND JURY CHARGES THAT:

16

17 **COUNT ONE**

18 Unauthorized Access to a Protected Computer

19 1. Between on or about May 24, 2013, and on or about July 30, 2013, in the State
 and Federal District of Nevada,

20 JEFFREY CHRISTOPHER GRANADOS

21 defendant herein, did knowingly and intentionally access and cause to be accessed without
 22 authorization, and thereby obtained information, to wit: the contents of the victim's wireless
 23 service account, from a computer used in and affecting interstate and foreign commerce, namely,
 24 a server of Verizon Wireless, in furtherance of the crime of Use of a Telecommunication Device

1 to Annoy, Abuse, Threaten and Harass and the torts of Invasion of Privacy and Intentional
2 Infliction of Emotional Distress, all in violation of Title 18, United States Code, § 1030(a)(2)(C),
3 and § 1030(c)(2)(B)(ii).

4 **COUNT TWO**

5 Unauthorized Access to a Protected Computer

6 2. On or about June 25, 2013, in the State and Federal District of Nevada,

7 **JEFFREY CHRISTOPHER GRANADOS**

8 defendant herein, did knowingly and intentionally access and cause to be accessed without
9 authorization, and thereby obtained information, to wit: the contents of the victim's wireless
10 service account, from a computer used in and affecting interstate and foreign commerce, namely,
11 a server of Facebook, in furtherance of the crime of Use of a Telecommunication Device to
12 Annoy, Abuse, Threaten and Harass and the torts of Invasion of Privacy and Intentional
13 Infliction of Emotional Distress, all in violation of Title 18, United States Code, § 1030(a)(2)(C),
14 and § 1030(c)(2)(B)(ii).

15 **COUNT THREE**

16 Unauthorized Access to a Protected Computer

17 3. Between on or about June 17, 2013, and on or about August 11, 2013, in the State
and Federal District of Nevada,

18 **JEFFREY CHRISTOPHER GRANADOS**

19 defendant herein, did knowingly and intentionally access and cause to be accessed without
20 authorization, and thereby obtained information, to wit: the victim's employee account
21 information, from a computer used in and affecting interstate and foreign commerce, namely, a
22 server of Kenexa, Inc., in furtherance of the crimes of Use of a Telecommunication Device to
23 Annoy, Abuse, Threaten and Harass, and Violation of a Protective Order in violation of NRS

1 33.070, and the torts of Invasion of Privacy and Intentional Infliction of Emotional Distress, all
2 in violation of Title 18, United States Code, § 1030(a)(2)(C), and § 1030(c)(2)(B)(ii).

3 **COUNT FOUR**

4 Unlawful Access to Stored Communications

5 4. Between on or about May 24, 2013, and on or about July 30, 2013, in the State
and Federal District of Nevada,

6 JEFFREY CHRISTOPHER GRANADOS

7 defendant herein, did knowingly and intentionally access without authorization a facility through
8 which an electronic communication service is provided, as defined in Title 18, United States
9 Code, Section 2510(15), to wit: the Verizon Wireless servers, and thereby obtained, altered, and
10 prevented authorized access to a wire and electronic communication while it was in electronic
11 storage in such system for the purpose of malicious destruction and damage and in furtherance of
12 the crime of Use of a Telecommunication Device to Annoy, Abuse, Threaten and Harass and the
13 torts of Invasion of Privacy and Intentional Infliction of Emotional Distress, all in violation of
14 Title 18, United States Code, § 2701(a)(1) and § 2701(b)(1).

15 **COUNT FIVE**

16 Use of a Telecommunication Device to Annoy, Abuse, Threaten and Harass

17 5. On or about June 20, 2013, in the State and Federal District of Nevada,

18 JEFFREY CHRISTOPHER GRANADOS

19 the defendant herein, did utilize a telecommunications device without disclosing his identity and
20 with intent to abuse, threaten, and harass A.B. and S.B., all in violation of Title 47, United States
Code, Section 233(a)(1)(C).

21 **FORFEITURE ALLEGATION**

22 1. The allegations of Counts One, Two, and Three of this Criminal Indictment are
hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture

pursuant to Title 18, United States Code, Section 1030(j)(1).

2. Upon a conviction of any felony offense charged in Counts One, Two, and Three of this Criminal Indictment.

JEFFREY CHRISTOPHER GRANADOS

defendant herein, shall forfeit to the United States of America, any personal property used or intended to be used to commit or to facilitate the commission of any violation of Title 18, United States Code, Section 1030(a)(2)(C):

- a. A MacBook Pro S/N: W8921A8F66D;
- b. a MacBook Pro S/N: C02HF14VDV11; and
- c. an iPhone S/N: C28H72S1DTD1

All pursuant to Title 18, United States Code, Section 1030(a)(2)(C) and (j)(1).

DATED: this 1st day of February, 2014

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney

ROGER YANG
Assistant United States Attorney